

**DECLARATION OF ALEJANDRA O’CONNOR**

I, Alejandra O’Connor, declare as follows:

1. I am over 18 years of age and competent to make the statements in this declaration. This declaration is provided pursuant to and under the provisions of the Protective Order previously entered in this matter.

2. This declaration is submitted in support of Defendants’ Opposition to Plaintiffs’ letter brief seeking snapshots from the Safety Lens user interface hyperlinked in Jira tickets produced in Uber’s Defendant Fact Sheets (“DFS”).

3. I am a Senior Manager, Safety and Core Services Legal at Uber Technologies, Inc. (“Uber”). I have been employed at Uber since December, 2016, and have held my current position since August 2024. At Uber I previously held the positions of Paralegal I, Insurance Litigation; Paralegal II, Insurance Litigation; Senior Paralegal, Safety & Insurance; and Lead Paralegal, Safety & Insurance. Over the course of my employment at Uber, I have acquired personal knowledge of Uber’s communication tools and data sources.

4. The contents of this declaration are true and correct to the best of my knowledge, information, and belief, and are based on my personal knowledge of Uber’s safety reporting tools and interfaces.

5. “Safety Lens” is a proprietary, limited-access internal web-based user interface (“UI”) that provides Uber safety agents with certain information about [REDACTED] individuals with an Uber account, *i.e.*, independent drivers and riders. This information includes the [REDACTED], as well as [REDACTED] and [REDACTED]. It also includes [REDACTED].

[REDACTED], and [REDACTED]. Uber is required to provide this [REDACTED] separately in the DFS for all independent drivers who provided a ride on “Subject Trip,” or ride identified by a Plaintiff as connected to their legal claim in this litigation.

6. The [REDACTED] hyperlinked in a user’s Safety Lens landing page are the same [REDACTED] Uber has and continues to produce, when the reports fall under the categories Uber is required to produce in DFS Questions 26 and 27. Safety Lens also includes [REDACTED] Uber is not required to produce as part of DFS (e.g. speeding, dangerous driving).

7. According to a preliminary analysis by counsel shared with me, there are at least 1,105 Jiras that include links to Safety Lens, and at least 388 of those [REDACTED]. However, the current number may be higher, and as new cases continue to be added to this mass tort, the number will increase. Upon information and belief, those 1,100 currently-identified Jiras contain not only links to the Safety Lens landing page for independent drivers, but also for account holders who ordered the Subject Trip, and guest riders on the Subject Trip who have their own Uber accounts.

8. In order to provide snapshots of the Safety Lens UI that may be linked in a Jira ticket, a member of my team would first need to rely on the Uber eDiscovery Team to extract the links to the Safety Lens from each Jira. These links may display as a URL but may also be under hyperlinked text.

9. Once we have the links available, a member of my team would need to manually access each link, and use a screen-grab tool to make a snapshot of each hyperlinked Safety Lens user landing page. For 1,105 Jiras, this collection would take approximately 100 of person-hours

to complete. My team has already spent more than 2,500 person-hours collecting supporting documents for DFS, and that work continues as new Plaintiffs are added to the case.

10. Once collected by my team, these snapshots would be subject to processing, as well as review and redaction for PII, because they may include private information of non-parties.

Executed on April 10, 2025, at Chicago, Illinois.



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ALEJANDRA O'CONNOR